

STEVEN M. WOODSIDE, State Bar No. 58684
 County Counsel
 ANNE L. KECK, State Bar No. 136315
 Deputy County Counsel
 County of Sonoma
 575 Administration Drive, Room 105A
 Santa Rosa, California 95403-2815
 Telephone: (707) 565-2421
 Facsimile: (707) 565-2624
 E-mail: akeck@sonoma-county.org

Attorneys for Defendants the County
 of Sonoma, Sheriff-Coroner William
 Cogbill, and County employees Michael
 Shanahan, Caroline Japp, Jo Weber,
 and Robin Smith

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

SALLY STEINHART,

No. CV-10-00841 RS

Plaintiff,

v.

COUNTY OF SONOMA, SHERIFF-CORONER
 BILL COGBILL and DEPUTY SHERIFFS M.
 SHANAHAN and CAROLYN ZOE; HUMAN
 SERVICES DEPARTMENT DIRECTOR JO
 WEBER; FAMILY, YOUTH & CHILDREN'S
 SERVICES DIVISION DIRECTOR CAROL
 BAUER, AND CHILD WELFARE
 SERVICES/PROTECTIVE SERVICES SOCIAL
 WORKER ROBIN SMITH, individually and in their
 official capacities, CALIFORNIA DEPARTMENT
 OF SOCIAL SERVICES, DOES 1-50, et al.,

Defendants.

**STIPULATION TO (1) PERMIT
 FILING OF AN AMENDED
 COMPLAINT, (2) EXTEND COUNTY
 DEFENDANTS' TIME TO RESPOND
 TO THE COMPLAINT, AND (3) RE-
 SCHEDULE CASE MANAGEMENT
 CONFERENCE DATES; ~~PROPOSED~~
 ORDER**

This joint stipulation and request for entry of order is entered into by and between Plaintiff in
 pro per, Sally Steinhart ("Plaintiff"), and Defendants the County of Sonoma, Sheriff-Coroner
 William Cogbill, Sheriff's Deputy Michael Shanahan, Sheriff's Deputy Caroline Japp (erroneously
 sued herein as Carolyn Zoe), and Sonoma County employees Jo Weber and Robin Smith

Stipulation to (1) Permit Filing of an Amended
 Complaint, (2) Extend County Defendants' Time to
 Respond to the Complaint, and (3) Reschedule Case
 Management Conference Dates; ~~Proposed~~ Order

(collectively, "County Defendants"). Defendant the State Department of Social Services is not a party to this stipulation. This stipulation and concomitant request for order is made based upon Plaintiff's stated intent to amend the Complaint, as well as to provide County Defendants additional time in which to respond to the Complaint, and to reschedule the dates set forth in the Order Setting Initial Case Management Conference and ADR Deadlines, entered on February 26, 2010 (Docket No. 2, hereinafter the "CMC Order"). The terms and provisions of this stipulation and request for order are set forth below.

RECITALS

A. Plaintiff filed her Complaint for Declaratory and Injunctive Relief and Damages herein on February 26, 2010 (the "Complaint"). Plaintiff believes that she effectuated service of the Complaint on all County Defendants identified above on or about May 12, 2010. Plaintiff has not yet effectuated service on Defendant the State Department of Social Services, nor Defendant and former Sonoma County employee Carol Bauer (retired).

B. Plaintiff has informed counsel for County Defendants of her intent to amend the Complaint. Further, counsel for County Defendants has agreed to provide information to Plaintiff to assist her in amending her Complaint.

C. The CMC Order sets the initial case management conference date for June 10, 2010, and requires the parties to have met certain requirements by May 20, 2010; such requirements have not been met based on the date of service of the Complaint. In addition, the parties believe that the case management conference will be more effective if held after the pleadings have been settled.

WHEREFORE, the parties hereby stipulate and request entry of a court order as follows:

STIPULATION

1. Should Plaintiff desire to amend her complaint, she must file and serve an amended complaint in this action on or before June 15, 2010.

2. County Defendants shall file and serve their responsive pleading to either the initial Complaint or any amended complaint, as applicable, on or before July 15, 2010.

3. The dates set forth in the CMC Order shall be amended and revised to set the initial case management conference to occur on October 21, 2010, at 10:00 a.m.; all other dates set forth in the CMC Order shall be continued accordingly.

4. This stipulation does not prevent or preclude the parties from seeking additional relief from this Court, to amend this stipulation and order or otherwise.

Respectfully submitted,

Dated: May 25, 2010

Stephen M. Woodside, County Counsel

By: /s/ Anne L. Keck
Anne L. Keck, Deputy County Counsel
Attorneys for County Defendants

Dated: May 25, 2010

Sally Steinhart, Plaintiff in pro per

By: /s/ Sally Steinhart
Sally Steinhart

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~~PROPOSED~~ ORDER

Pursuant to the foregoing stipulation, and with good cause appearing,

IT IS HEREBY ORDERED that Plaintiff shall have through June 15, 2010, to file an amended complaint herein, and County Defendants shall have through July 15, 2010, to file a responsive pleading to either the initial or amended complaint, as applicable.

IT IS FURTHER ORDERED that the Clerk shall issue an amended and revised CMC Order, rescheduling the initial case management conference for October 21, 2010, at 10:00 a.m., and continuing all other dates set forth in the original CMC Order (Pocket No. 2) accordingly.

Date: May 26, 2010


HONORABLE RICHARD S. LEBORG
United States District Judge